

Exhibit C

to Notice of Removal

State Court Process and Filings
Part 3 of 4

FILED
01-02-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12

Enter the name of the county in which this case is filed.

STATE OF WISCONSIN, CIRCUIT COURT,
DANE COUNTY

Enter the Petitioner/Plaintiff's full name.

Petitioner/Plaintiff:

INSPIRED PURSUITS, LLC, et al.

First name Middle name Last name

Respondent/Defendant:

PARAGON COMPONENT SYSTEMS, LLC, et al.

First name Middle name Last name

Enter the Respondent/Defendant's full name.

Enter the case number.

This form is used for all case types. Some information may not apply to your case.

Motion to Seal or Redact a Court Record

Case No. 25-CV-

In #1, enter the name and date of the documents that you wish to have sealed.

- ☒ 1. I request that the following document(s) be **sealed**:

Name of Document	Date of Filing
Exhibit B	01/02/25
Exhibit M	01/02/25

Use GF-242A to request redaction of Social Security, driver license, financial accounts, and other protected numbers to the court.

Some documents are confidential by law and do not require a motion to seal. See GF-244 for information about these documents.

- ☐ 2. I request that the following type of information be **redacted** from the court record:

Location in the Court Record		
Type of Information to be Redacted	Date of Proceeding	Page and Line Number

In #2, describe the type of info you wish to have redacted. For example, "Petitioner's home address", date of the documents and exact location of the information. Note every place where the information appears. The court is not responsible for finding the information in other places.

Do NOT put the actual information to be redacted on this form. Use form GF-245 to provide the information to the court.

In #4, if the court needs to consider certain facts to decide this motion, you should include a sworn affidavit setting out the information. Most circuit court records are open to the public. The court will not seal or redact records without a legal basis for the decision. You must cite statutes and case law that support your request.

3. I am filing form GF-245 to provide the sealed or redacted information to the court.


4. I am making this request based on the following law and facts:

See attached Memorandum.

In #5, if you are not a party or the attorney for a party, describe your relationship to this case.

- ☐ 5. I am not an attorney or a party to this case. I am interested because:


Sign and print your name and date the document.

► 
 Signature
 Mayville La Rosa, Esq.
 Print or Type Name
 Attorney for Plaintiffs
 Relationship to Case
 01/02/2025
 Date

DISTRIBUTION:

1. Court
 2. Parties
 3. Petitioner, if not a party

FILED
01-02-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12

Enter the name of the county in which this case is filed.	STATE OF WISCONSIN, CIRCUIT COURT, <u>DANE</u> COUNTY
Enter the Petitioner/Plaintiff's full name.	Petitioner/Plaintiff: INSPIRED PURSUIITS, LLC, et al. <hr/> First name Middle name Last name Respondent/Defendant: PARAGON COMPONENT SYSTEMS, LLC, et al. <hr/> First name Middle name Last name
Enter the Respondent/Defendant's full name.	Confidential Disclosure of Information to be Sealed or Redacted Case No. <u>25-CV-</u>
Enter the case number.	
This form is used with GF-246A when requesting that the court seal or redact information from the court records. If the court grants the motion to seal or redact, this form will be sealed. Use GF-241 to provide Social Security, driver license, financial accounts, and other protected numbers to the court. This form is used for all case types. Some information may not apply to your case. Be specific. For example, "Petitioner's home address: 1234 Main Street, Kenosha, WI 53140."	The information that I request to be <input checked="" type="checkbox"/> sealed <input type="checkbox"/> redacted is: 1. <u>Exhibit B</u> 2. <u>Exhibit M</u> 3. _____ 4. _____ 5. _____ 6. _____ 7. _____ 8. _____ 9. _____ 10. _____
Upon request, the information on this form will be sealed until the court reviews the motion. Sign and print your name and date the document.	<input checked="" type="checkbox"/> The document to be sealed is attached. <input checked="" type="checkbox"/> I am filing this information under temporary seal until the court rules on this motion.
<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 45%;"> <p>► </p> <p>Signature Mayville La Rosa, Esq.</p> <hr/> <p>Print or Type Name Attorney for Plaintiffs</p> <hr/> <p>Relationship to Case 01/02/2025</p> <hr/> <p>Date</p> </div> </div>	

CONFIDENTIAL COURT RECORD

GF-245, 05/16 Confidential Disclosure of Information to be Sealed or Redacted

§801.21, Wisconsin Statutes

This form shall not be modified. It may be supplemented with additional material.

Page 1 of 1

FILED
01-02-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12

EXHIBIT B


Motion to Seal Pending

EXHIBIT M

Motion to Seal Pending

SEALED

FILED
01-06-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036

Enter the name of the county in which this case is filed.	STATE OF WISCONSIN, CIRCUIT COURT, DANE COUNTY																								
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Sign and print your name and date the document.	<div style="text-align: center;">  Signature Mayville La Rosa, Esq. <hr/> Print or Type Name Attorney for Plaintiffs <hr/> Relationship to Case 01/02/2025 <hr/> Date </div>																								

DISTRIBUTION:

1. Court
2. Parties
3. Petitioner, if not a party

STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

INSPIRED PURSUITS, LLC, et al.,

Plaintiffs,

v.

PARAGON COMPONENT SYTEMS, LLC,
et al.,

Defendants.

Case No. 25-CV-36

PLAINTIFFS MEMORANDUM IN SUPPORT OF THEIR MOTION TO SEAL

Plaintiffs, by their undersigned counsel, submit this memorandum in support of their Motion to Seal.

The public's right to access court documents is well established in Wisconsin courts. However, this right to inspect documents is not absolute and the presumption of open records does not apply if there is a clear statutory or common law limitation. *Beckon v Emery*, 36 Wis. 2d 510, 518, 153 N.W.2d 501 (1967); *Hathaway v Green Bay School District*, 116 Wis.2d 388, 397 (1984). Wis. Stat. § 840.01.3(a) provides such exception for trade secrets.

To determine whether a court record should be sealed, the court must balance harm done to the public interest to access court records compared against the benefit to the public having access to the court record. *State ex rel. Bilder v. Delavan Twp.*, 112 Wis. 2d 539, 334 N.W.2d 252 (1983). Between these two statutory and common law approaches, Plaintiffs moves this court to grant Plaintiff's request to seal Exhibits B and M.

I. Statutory Exception

This case is centered on a business model that is unique in the Structural Building Components (“SBC”) industry. Plaintiffs assert that the exhibits under this motion to seal qualifies as a trade secret under Wis. Stat. § 134.90(1)(c). The documents subject to the protective order contain valuable, nonpublic information that would cause competitive injury if publicly disclosed.

Pursuant to Wis. Stat. § 134.90(1)(c), the proposed Exhibits to be sealed is a formula, program, method, technique or process. The proposed Exhibits meet the statute’s two part test:

- a) The information derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.
- b) The information is the subject of efforts to maintain its secrecy that are reasonable under the circumstances.

Although Wisconsin courts have not yet ruled on a case where a business model is asserted to be a trade secret, Plaintiffs respectfully request this court to consider persuasive authority such as *Sharetown, Inc. v. Hall*, No. 2:21-CV-00742-TC-CMR, 2022 WL 1014790 (D. Utah Apr. 5, 2022). In *Sharetown*, the court found the trade secret was in the “proprietary approach to providing” services in combination with contact information as to how the business model is to be deployed. Analogous to this case is the proprietary approach to providing truss design and manufacturing services.

During the development of the business model, Plaintiffs have taken measures to protect the confidentiality of their partnership. As the business model was ready to be made public, appropriate individuals were asked to sign an NDA as discussed in the initiating Complaint.

The Exhibits Plaintiffs are providing for the court’s review was wrongfully disclosed to the public by Defendants. Exhibits M is distinctly marked intellectual property and trade secrets. Even if Defendants disagree that the contents are not trade secrets or intellectual property, they were not in

the position to make that determination. At this time, Plaintiffs reserve the right to bring an action against the Defendants regarding the unlawful public disclosure of these exhibits. Plaintiffs desire to mitigate damages and preserve its rights to claim the contents of these exhibits as confidential trade secrets.

II. Common Law Exception

Fundamental to a democratic system is the principle of transparency. Access to court records supports such principle so people know the operations of their government. *State v. Delavan* at 553. The *Delavan* case examines three exceptions to the “absolute right” of public examination. First exception allows for sealing documents when there is a statute that authorizes the action. In this case is Wis. Stat. § 840.01.3(a) gives the court power to seal documents that are trade secrets. Part III of this memorandum will provide further detail as to the trade secrets in the Exhibits Plaintiffs seek to protect.

The second exception in the *Delavan* court is that “disclosure must yield if it infringes on a constitutional right.” Although the *Delavan* court chose to distinguish that case from the *Ampco* case, the court still cited *Ampco* to apply in cases where trade secrets are involved. *State v. Delavan* at 555. See also *State ex rel. Ampco Metal, Inc. v. O'Neill*, 273 Wis. 530, 78 N.W.2d 921 (1956). The *Ampco* court stated that “great care should be exercised by the trial court...to guard against the disclosure during the trial of what may ultimately prove to be trade secrets belonging to the plaintiff.” *Ampco* at 538, [citing *Nat'l Starch Prods. v. Polymer Indus.*, 273 A.D. 732, 79 N.Y.S.2d 357 (App. Div. 1948)]. Furthermore, the *Ampco* court recognized that disclosure of the trade secret during trial “would deny the plaintiff a remedy for the wrong it sought to prevent.” *Ampco* at 540. In the court’s practice to assume the allegations in a complaint are true, it must also give plaintiffs the presumption that the trade secrets it asserts are trade secrets. Therefore, it would be proper in this case to allow the sealing of the listed Exhibits below.

The third exception considered by the *Delavan* court is the inherent power of the court system to take certain evidence *in camera*. Denying the courts that inherent power would be unconstitutional. *Delavan* at 556. Sealing the exhibits would counter that balance. The same analysis would apply here. Based on the reputation of the parties on both sides in this case, it will likely garner attention from the public but specifically the SBC industry. Therefore, to balance the public's right to examination of court records, it would be proper for this Court to allow the sealing of the Exhibits listed below.

III. Plaintiffs request the following Exhibits with further detail as to why it is a trade secret and necessary to be placed under a protective order:

Exhibit B is a document that details the Developed TS/IP. The trade secret lies in organizing the business structure in such a way to be compliant with applicable laws pertaining to engineering, manufacturing, and the workflow of the businesses. This business model is built on decades of experience and in-depth knowledge of the structural industry.

Exhibit M provides details of the strategic partnership between Plaintiffs. Specifically, page 9-13 provides details of how the source code purchased in 2009 was used to develop the business model. It also contains the marketing strategy of how the business model is to be deployed such as meetings set up with industry members. Similar to the *Sharetown* case, the contacts in combination with the business model was considered a trade secret.

For the reasons stated above, Plaintiffs respectfully requests this court to grant its motion to seal the named Exhibits from public record.

This 2nd day of January 2025.

Respectfully submitted,

Mayville La Rosa, Esq. WI Bar# 1119613
6300 Enterprise Ln
Madison, WI 53719
Phone: (608) 800-7353
Email: mlarosa@kfinnovations.com

FILED
01-07-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036

Enter the name of the county in which this case is filed.	STATE OF WISCONSIN, CIRCUIT COURT, <u>DANE</u> COUNTY		
Enter the Petitioner/Plaintiff's full name.	Petitioner/Plaintiff: <u>INSPIRED PURSUITS, LLC, et al</u>		
Enter the Respondent/Defendant's full name.	First name	Middle name	Last name
Enter the case number.	Respondent/Defendant: <u>PARAGON COMPONENT SYSTEMS, LLC, et al</u> Case No. <u>25-CV-36</u>		

A motion to seal or redact a court record or transcript has been filed with the court.

THE COURT ORDERS:

The motion to

- ☒ 1. **seal** the requested information is granted for the reasons set forth in this motion. The clerk shall seal the following documents:

Exhibit B

Exhibit M

Access to view document(s):

- ☒ Petitioner/Plaintiff ☒ Respondent/Defendant ☐ Social Worker ☐ Guardian
☒ Attorney ☐ Guardian ad Litem ☐ Probation
☐ Other: _____

- ☐ 2. **redact** the requested information is granted for the reasons set forth in this motion. The clerk shall redact the following information:

Access to view document(s):

- ☐ Petitioner/Plaintiff ☐ Respondent/Defendant ☐ Social Worker ☐ Guardian
☐ Attorney ☐ Guardian ad Litem ☐ Probation
☐ Other: _____

☐ The clerk shall perform the redaction as identified in this motion for previously filed documents.

☐ The parties shall omit or redact this information from all documents subsequently filed.

- ☐ 3. seal or redact is denied because

- ☐ A. the request lacks a sufficient legal basis.
☐ B. the requester has not made a sufficient factual showing.
☐ C. Other: _____

- ☐ 4. Other: _____

DISTRIBUTION:

1. Court
2. Parties
3. Petitioner, if not a party

FILED
01-08-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036

DATE SIGNED: January 7, 2025

Electronically signed by Ann Peacock
 Circuit Court Judge

Enter the name of the county in which this case is filed.	STATE OF WISCONSIN, CIRCUIT COURT, <u>DANE</u> COUNTY		
Enter the Petitioner/Plaintiff's full name.	Petitioner/Plaintiff: <u>INSPIRED PURSUITS, LLC, et al</u>		
Enter the Respondent/Defendant's full name.	First name	Middle name	Last name
	Respondent/Defendant: <u>PARAGON COMPONENT SYSTEMS, LLC, et al</u>		
Enter the case number.	First name	Middle name	Last name
	Case No. <u>25-CV-36</u>		

**Order on Motion
To Seal or Redact
a Court Record**

A motion to seal or redact a court record or transcript has been filed with the court.

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- ☐ 4. Other: _____

DISTRIBUTION:

1. Court
 2. Parties
 3. Petitioner, if not a party

STATE OF WISCONSIN**CIRCUIT COURT****DANE**

Inspired Pursuits, LLC et al vs. Paragon Component
Systems LLC et al

**Electronic Filing
Notice**

Case No. 2025CV000036
Class Code: Other-Contract

FILED
01-22-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12

PARAGON COMPONENT SYSTEMS LLC
200 WEST MLK BOULEVARD STE 1000 PMB 0196
CHATTANOOGA TN 37402

Case number 2025CV000036 was electronically filed with/converted by the Dane County Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases.

Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. Electronic parties are responsible for serving non-electronic parties by traditional means.

You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a fee to register as an electronic party. This fee may be waived if you file a Petition for Waiver of Fees and Costs Affidavit of Indigency (CV-410A) and the court finds you are indigent under §814.29, Wisconsin Statutes.

If you are not represented by an attorney and would like to register an electronic party, you will need to enter the following code on the eFiling website while opting in as an electronic party.

Pro Se opt-in code: 32efa1

Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Registration is available to attorneys, self-represented individuals, and filing agents who are authorized under Wis. Stat. 799.06(2). A user must register as an individual, not as a law firm, agency, corporation, or other group. Non-attorney individuals representing the interests of a business, such as garnishees, must file by traditional means or through an attorney or filing agent. More information about who may participate in electronic filing is found on the court website.

If you have questions regarding this notice, please contact the Clerk of Circuit Court at 608-266-4311.

Dane County Circuit Court
Date: January 22, 2025

STATE OF WISCONSIN**CIRCUIT COURT****DANE**Inspired Pursuits, LLC et al vs. Paragon Component
Systems LLC et al**Electronic Filing
Notice**Case No. 2025CV000036
Class Code: Other-Contract**FILED**
01-22-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12CLEARSPAN COMPONENT SYSTEMS, LLC
109 EXECUTIVE DRIVE SUITE 3
CORPORATION SERVICE COMPANY
MADISON MS 39110

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Dane County Circuit Court
Date: January 22, 2025

STATE OF WISCONSIN**CIRCUIT COURT****DANE**

Inspired Pursuits, LLC et al vs. Paragon Component
Systems LLC et al

**Electronic Filing
Notice**

Case No. 2025CV000036
Class Code: Other-Contract

FILED
01-22-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12

JOHN HOLLAND
302 MACFARLAND RD
LOOKOUT MOUNTAIN GA 30750

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Inspired Pursuits, LLC et al vs. Paragon Component
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Case No. 2025CV000036
Class Code: Other-Contract

FILED
01-22-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12

JAMES HOLLAND
880 DALEVILLE PRISMATIC ROAD
DALEVILLE MS 39326

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Date: January 22, 2025

STATE OF WISCONSIN**CIRCUIT COURT****DANE**

Inspired Pursuits, LLC et al vs. Paragon Component
Systems LLC et al

**Electronic Filing
Notice**

Case No. 2025CV000036
Class Code: Other-Contract

FILED
01-22-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12

ANDREW EWIN
1815 WALKER ST
CHATTANOOGA TN 37404

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Dane County Circuit Court
Date: January 22, 2025

STATE OF WISCONSIN**CIRCUIT COURT****DANE**

Inspired Pursuits, LLC et al vs. Paragon Component
Systems LLC et al

**Electronic Filing
Notice**

Case No. 2025CV000036
Class Code: Other-Contract

FILED
01-22-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12

DAVID REED
3911 HOWARD RD
CHATTANOOGA TN 37411

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2025CV000036
Honorable Ann Peacock
Branch 12

SCOTT HOELSEMA
1607 MULBERRY ST
CHATTANOOGA TN 37404

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2025CV000036
Honorable Ann Peacock
Branch 12

SETH DUNCAN
5 BROCKHAVEN RD
CHATTANOOGA TN 37404

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Honorable Ann Peacock
Branch 12

MICHAEL PITTS
185 MONTAG CIR. NE UNIT 208
ATLANTA GA 30307

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2025CV000036
Honorable Ann Peacock
Branch 12

AVERY RADMACHER
107 CENTURY DR
ROSSVILLE GA 30741

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Honorable Ann Peacock
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NATHAN BIERMA
3209 PARKWOOD AVE
RICHMOND VA 23221

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Honorable Ann Peacock
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JEREMY BIERMA
34 INTERNATIONAL AVE
PISCATAWAY NJ 08854

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DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12ROB EASON
11058 HIGHWAY 39
DALEVILLE MS 39326

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Class Code: Other-Contract**FILED**
01-22-2025
CIRCUIT COURT
DANE COUNTY, WI
2025CV000036
Honorable Ann Peacock
Branch 12ESTATE OF DANIEL HOLLAND
2101 5TH ST
MERIDIAN MS 39301

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STATE OF WISCONSIN

CIRCUIT COURT

DANE COUNTY

INSPIRED PURSUITS, LLC
QUALTIM, INC.
CENTER FOR BUILDING INNOVATION, LLC,
DRJ ENGINEERING LLC
KIRK GRUNDAHL AND SUZANNE
GRUNDAHL

Plaintiffs,

v.

PARAGON COMPONENT SYTEMS, LLC,
JOHN HOLLAND, JAMES HOLLAND,
CLEARSPAN COMPONENTS, LLC, *et al*
See attached complete list of all Defendants

Defendants.

Case No. 25-CV-36
Civil 3000
Injunction 30704

AMENDED SUMMONS

You are hereby notified that the Plaintiff named above has filed a lawsuit or other legal action against you. The complaint, which is attached, states the nature and basis of the legal action.

Within (20) days of receiving this summons, you must respond with a written answer, as that term is used in chapter 802 of the Wisconsin Statutes, to the complaint. The court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to the court, whose address is:

Dane County Circuit Court, Dane County Courthouse 215 S. Hamilton Street, Madison, WI 53703 and to Mayville La Rosa, Plaintiffs' attorney, whose address is **6300 Enterprise Ln., Madison, WI 53719**. You may have an attorney help or represent you.

If you do not provide a proper answer within (20) days, the court may grant judgment against you for the award of money or other legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated this 21st day of January 2025.

MAYVILLE LA ROSA
Attorney for Plaintiffs

Electronically signed by:
s/ Mayville la Rosa
MAYVILLE LA ROSA
Attorney for Plaintiffs
State Bar #: 1119613

Mayville La Rosa
Corporate Counsel for Plaintiffs
6300 Enterprise Ln,
Madison, WI 53719

Complete List of All Defendants and last known addresses

Estate of Daniel Holland
2101 5th St
Meridian, MS 39301

Michael Pitts
185 Montag Cir, NE, Unit 208
Atlanta, GA 30307

Paragon Component Systems, LLC
200 West Milk Boulevard Ste 1000 PMB 0196
Chattanooga, TN 37402

Avery Radmacher
107 Century Dr
Rossville, GA 30741

Clearspan Component Systems, LLC
Registered Agent: Corporation Service Company
109 Executive Drive Suite 3
Madison, MS 39110

Nathan Bierema
3209 Parkwood Ave
Richmond, VA 23221

John Holland
302 McFarland Rd
Lookout Mountain, GA 30750

Jeremy Bierema
34 International Ave
Piscataway, NJ 08854

James Holland
880 Daleville Prismatic Road
Daleville, MS 39326

Rob Eason
11058 Highway 39
Daleville, MS 39326

Andrew Ewin
1815 Walker St
Chattanooga, TN 37404-1322

David Reed
3911 Howard Ave
Chattanooga, TN 37411

Scott Hoelsema
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Baltimore, MD 21218

Seth Duncan
10 Alice Road
Anniston, AL 36207